IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ON SEMICONDUCTOR CORP. and SEMICONDUCTOR COMPONENTS INDUSTRIES, L.L.C.,	))))	
Plaintiffs,	))	
v.	))	C.A. No. 07-449 (JJF)
SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC., SAMSUNG TELECOMMUNICATIONS AMERICA GENERAL, L.L.C., SAMSUNG SEMICONDUCTOR, INC., and SAMSUNG AUSTIN SEMICONDUCTOR L.L.C.,	))))))	
Defendants.	))	
SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC., SAMSUNG TELECOMMUNICATIONS AMERICA GENERAL, L.L.C., SAMSUNG SEMICONDUCTOR, INC., and SAMSUNG AUSTIN SEMICONDUCTOR L.L.C.,	)))))))	
Plaintiffs,	))	
v.	))	C.A. No. 06-720 (JJF)
ON SEMICONDUCTOR CORP. and SEMICONDUCTOR COMPONENTS INDUSTRIES, L.L.C.,	))))	
Defendants.	)	

**NOTICE OF DEPOSITION OF
SAMSUNG ELECTRONICS CO., LTD.
<u>PURSUANT TO FED. R. CIV. PROC. 30(b)(6)</u>**

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of

Civil Procedure, ON Semiconductor Corp., and Semiconductor Components Industries, L.L.C.

(collectively "ON Semiconductor") will take the deposition by oral examination of Samsung

Electronics Co., Ltd.; Samsung Electronics America, Inc.; Samsung Telecommunications

America General, L.L.C.; Samsung Semiconductor, Inc.; and Samsung Austin Semiconductor, L.L.C. (collectively, "Samsung"). The deposition will commence at **10:00 a.m.** on **June 26, 2008**, at the offices of Jones Day, 1755 Embarcadero Rd., Palo Alto, CA 94303, or at such other time and place as counsel may agree.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 30(b)(6), Samsung must designate one or more officers, directors, managing agents, or other persons who are most qualified, knowledgeable and competent to testify on its behalf with respect to each of the topics described in Schedule A. In addition, Samsung is requested to provide ON Semiconductor's counsel with written notice, at least one week in advance of the deposition, of the name and title of each witness who will testify on behalf of Samsung, and the particular topic(s) set forth in Schedule A as to which each such witness will testify.

The deposition will be taken before a notary public or other officer authorized to administer oaths under law, and will continue from day to day until completed. The deposition will be recorded by sound and/or stenographic means and may be videotaped. You are invited to attend.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Richard J. Bauer

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June 2, 2008

SCHEDULE A

DEFINITIONS AND INSTRUCTIONS

1.   "ON SEMICONDUCTOR PATENTS" refers to the United States Patent

Nos. 6,362,644; 5,563,594; 5,361,001; and 5,000,827, including any reexaminations.

2.   "ON SEMICONDUCTOR PRODUCTS" refers to any accused apparatus,

product, device, process, method, act, and/or other instrumentality that Plaintiffs asserts

INFRINGE United States Patent No. 5,252,177.

3.   "SAMSUNG," "YOU," and "YOUR" refers to Samsung Electronics Co.,

Ltd.; Samsung Electronics America, Inc.; Samsung Telecommunications America General, LLC;

Samsung Semiconductor, Inc.; and Samsung Austin Semiconductor, LLC, their present and

former directors, officers, employees, attorneys, accountants, consultants, representatives, agents,

subsidiaries, divisions, successors in interest, any partnerships or joint ventures to which any of

the foregoing are a party, and/or other persons acting on behalf of any of the foregoing.

4.   "SAMSUNG PRODUCTS" refers to Double Data Rate (DDR)

Synchronous Dynamic Random Access Memory (SDRAM) including, but not limited to, DDR

SDRAM, Mobile DDR SDRAM, DDR2 SDRAM, GDDR SDRAM, GDDR2 SDRAM, and

GDDR3 SDRAM, as well as any integrated circuits manufactured using cup plating systems.

The "SAMSUNG PRODUCTS" include, but are not limited to, the following product

designations: K4B1G0446C-ZC(F7/F8/H9), K4B1G0846C-ZC(F7/F8/H9), K4B1G1646C-

ZC(F7/F8/H9), K4D261638, K4D263238, K4D551638, K4H1G0438A, K4H1G0638C,

K4H1G0738C, K4H1G0838A, K4H2G0638A, K4H510438C, K4H510438D-ZC(L)B3/CCC,

K4H510638E, K4H510638H, K4H510738E, K4H510738H, K4H510838C, K4H510838D,

K4H510838D-UC(L)B3/CCC, K4H510838D-ZC(L)B3/CCC, K4H511638C, K4H511638D,

K4H511638D-UC(L)B3/CCC, K4H511638D-ZC(L)B3/CCC, K4H560438E, K4H560438H,

K4H560438H-UC(L)B0,   K4H560438H-ZC(L)CC/B3,   K4H560838E,   K4H560838H,

K4H560838H-UC(L)B3/CCC, K4H560838H-ZC(L)B3/CCC, K4H561638H, K4H561638H-

UC(L)/B3/CCC, K4H561638H-ZC(L)B3/CCC, K4N51163Q, K4N56163Q, K4T1G044QA,

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ZC(D5/E6), K4T1G164QA, K4T1G164QC, K4T1G164QD-ZC(D5/E6), K4T2G044QM,

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K4T51083QE, K4T51083QE-ZC(CC/D5/E6/E7), K4T51163QC, K4T51163QE-ZC(CC/D5/E6),

K4T56043QF, K4T56043QG, K4T56083QF, K4T56083QG, K4U52324Q, K4X28163PH,

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(1)(2)(3)(4), K4X56163PG, K4X56163PG-(1)(2)(3)(4), K4X56323PG, K4X56323PG-

(1)(2)(3)(4), K5E1G131CA-D075000, K5W1G12ACD-DK75000, K7D161874B, K7D163674B,

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K7I323682C, K7I323684C, K7I641882M, K7I641884M, K7I643682M, K7I643684M,

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K7K1618T2C, K7K1636T2C, K7K3218T2C, K7K3236T2C, KAG001002A-DJJY000,

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M368L2923DUN,   M368L2923DUN-CB3/CCC,   M368L3223ET,   M368L3223HUS,

M368L3324CUS,   M368L3324DUS,   M368L6423ET(U)M,   M368L6423ET(U)N,

M368L6423HUN,   M368L6523CUS,   M368L6523DUS,   M368L6523DUS-CB3/CCC,

M378B2873CZ0-C(F7/F8/H9), M378B5673CZ0-C(F7/F8/H9), M378B6474CZ0-C(F7/F8/H9),

M378T2863AZ3,   M378T2863CZ3,   M378T2863DZS-C(D5/E6/E7/F7),   M378T2953CZ3,

M378T2953EZ3,   M378T2953EZ3-C(D5/E6/E7/F7),   M378T3354CZ3,   M378T3354EZ3,

M378T5663AZ3,   M378T5663CZ3,   M378T5663DZ3-C(D5/E6),   M378T5763MZ3,

M378T6453FZ3,   M378T6553CZ3,   M378T6553EZ3,   M378T6553EZS-C(D5/E6/E7/F7),

M381L2923CUM,   M381L2923DUM,   M381L2923DUM-CB3/CCC,   M381L3223ET(U)M,

M381L3223HUM,   M381L6423ET(U)M,   M381L6423HUM,   M381L6523CUM,

M381L6523DUM,   M381L6523DUM-CB3/CCC,   M391T2863AZ3,   M391T2953CZ3,

M391T2953EZ3,   M391T5663AZ3,   M391T5663CZ3,   M391T5763MZ3,   M391T6453FZ3,

M391T6553CZ3,   M391T6553EZ3,   M392T2863CZA,   M392T2950CZA,   M392T2950EZA,

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C(CC/D5/E6),   M393T2953CZ3,   M393T2953CZA,   M393T2953EZ3,   M393T2953EZ3-

C(CC/D5),   M393T2953EZA,   M393T2953EZA-C(CC/D5/E6),   M393T3253FZ3,

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M393T5160CZA,   M393T5160CZA-C(CC/D5/E6),   M393T5166AZ4,   M393T5166AZA,

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       5.   "SAMSUNG PATENT" refers to United States Patent No. 5,252,177.

6.   "SAMSUNG PATENTED PRODUCTS" refers to any product manufactured, sold, or licensed for/to/by Samsung that Samsung contends is covered by the SAMSUNG PATENT.

7.   "RELEVANT TIME PERIOD" refers to the time period from November 30, 2000 through and including the actual date of the deposition.

8.   "RELATING TO" means concerning, referring to, describing, evidencing, or constituting.

9.   "COMMUNICATION" refers to any transmittal of information in the form of facts, ideas, inquiries, or otherwise.

10.   "DOCUMENT" refers to the usage of this term in Federal Rule of Civil Procedure 34(a), and is synonymous in meaning and equal in scope to this usage, including, without limitation, electronically stored documents, photographs, tape recordings, or other sound or visual materials, computer databases, computer tapes, and any other materials that are in your actual or constructive possession, custody, or control, as well as all prior drafts of the foregoing, and copies of the foregoing on which any mark, alteration, writing, or other change from the original has been made. A draft or non-identical copy is a separate document within the meaning of the term.

11.   "PRIOR ART" means any patent, published patent application, publication, reference, apparatus, device, system, public knowledge, public use, sale, offer of sale, or invention relating to the subject matter of the claims of the SAMSUNG PATENT that is dated or may have occurred prior to any filing date for the SAMSUNG PATENT, related patents, and related applications, including buy not limited to any system, method, apparatus,

device , publication, patent, or use which has been cited to Samsung by any person or entity as "prior art" to the SAMSUNG PATENT or any related patent or related application.

12.   "INFRINGE" refers to, without limitation, both literal infringement and infringement under the doctrine of equivalents, contributory infringement, and inducement to infringe.

13.   "ALL" refers to all and each, and "EACH" refers to all and each.

14.   "AND" and "OR" refers to either disjunctive or conjunctive use as necessary to bring within the scope of the interrogatories all responses that might otherwise be construed to be outside of its scope.

15.   The use of the singular form of any word includes the plural and vice versa.

DEPOSITION TOPICS

1.   Parallel-to-serial multiplexing (including prefetch) sections, devices, mechanisms, methods, and/or circuitry used in the SAMSUNG PRODUCTS.

2.   The operation of parallel-to-serial multiplexing (including prefetch) sections, devices, mechanisms, methods, and/or circuitry used in the SAMSUNG PRODUCTS.

3.   The control of parallel-to-serial multiplexing (including prefetch) sections, devices, mechanisms, methods, and/or circuitry used in the SAMSUNG PRODUCTS.

4.   The Burst Mode operation of the SAMSUNG PRODUCTS, including the operation of the parallel-to-serial multiplexing (including prefetch) sections, devices, mechanisms, methods, and/or circuitry.

5.   The operation of the Mode Registers or Extended Mode Registers, e.g., MRS, EMRS and EMRS2, in the parallel-to-serial multiplexing (including prefetch) sections, devices, mechanisms, methods, and/or circuitry used in the SAMSUNG PRODUCTS.

6.   The operation of the Sense Amplifier, Row Decoder, Column Decoder, Column Buffer, Address Register, Counters, Timing Registers, Programming Register, Data Input Registers, I/O Control, and Output Buffer in the parallel-to-serial multiplexing (including prefetch) sections, devices, mechanisms, methods, and/or circuitry used in the SAMSUNG PRODUCTS.

7.   The role of the signals CK, CK\, CKE, CKE\, CS, CS\, RAS, RAS\, CAS, CAS\, WE, WE\, DM, LRAS, LCBR, LWE, LCAS, LWCBR, LDM, LCKE, ADD, and Data Strobe in the parallel-to-serial multiplexing (including prefetch) sections, devices, mechanisms, methods, and/or circuitry used in the SAMSUNG PRODUCTS.

8.   External package connections associated with parallel-to-serial multiplexing (including prefetch) sections, devices, mechanisms, methods, and/or circuitry used in the SAMSUNG PRODUCTS.

9.   Internal package connections associated with parallel-to-serial multiplexing (including prefetch) sections, devices, mechanisms, methods, and/or circuitry used in the SAMSUNG PRODUCTS.

10.   Die connections associated with parallel-to-serial multiplexing (including prefetch) sections, devices, mechanisms, methods, and/or circuitry used in the SAMSUNG PRODUCTS.

11.   The identity of each parallel-to-serial multiplexing (including prefetch) design including their schematic and layout designs.

12.   The identity of each parallel-to-serial multiplexing (including prefetch) design used in the SAMSUNG PRODUCTS.

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13.   The design, operation, circuit diagram, and layout of each circuit identified with a designation that includes "MUX," "MULTIPLEXER," or "PREFETCH" within the Basecamp or Virtuoso information produced by Samsung.

14.   The design and development of each SAMSUNG PRODUCT generally, and as it relates to parallel-to-serial multiplexing (including prefetch).

15.   The compliance with industry standards, including JEDEC, of each SAMSUNG PRODUCT generally, and as it relates to parallel-to-serial multiplexing (including prefetch).

16.   The compliance of each SAMSUNG PRODUCT with any version of JEDEC standard JESD79 (e.g., 79-2B, 79-2C) generally, and as it relates to parallel-to-serial multiplexing (including prefetch).

17.   The identity, content, and meaning of DOCUMENTS associated with the design and development of each SAMSUNG PRODUCT as it relates to parallel-to-serial multiplexing (including prefetch), including, but not limited to, design specifications, process flow documents, schematics and schematic databases, layouts and layout databases, and simulation files.

18.   The identity, roles, and current whereabouts of all people associated with the design and development of the SAMSUNG PRODUCTS as they relate to parallel-to-serial multiplexing (including prefetch).

19.   The identity, location, and role of all designers, design centers, manufacturers, and other facilities associated with the design and development of the SAMSUNG PRODUCTS as they relate to parallel-to-serial multiplexing (including prefetch).

20.   The simulation, modeling, and testing of each SAMSUNG PRODUCT, generally, and as it relates to parallel-to-serial multiplexing (including prefetch).

21.   The identity and content of any DOCUMENTS related to the testing of each SAMSUNG PRODUCT as it relates to parallel-to-serial multiplexing (including prefetch).

22.   The identity, roles, and current whereabouts of all people associated with the characterization, simulation, modeling, and testing of each SAMSUNG PRODUCT as it relates to parallel-to-serial multiplexing (including prefetch).

23.   The manufacturing of each SAMSUNG PRODUCT, including all process steps generally, and as it relates to parallel-to-serial multiplexing (including prefetch).

24.   The identity and content of any DOCUMENTS related to the manufacturing of each SAMSUNG PRODUCT as it relates to parallel-to-serial multiplexing (including prefetch), including design specifications, schematics, schematic databases, SPICE netlists, process flows, process recipes, GDSII data, layout guidelines, MEBES data, design rules, and simulation files.

25.   The identity, location, and role of all designers, design centers, manufacturers, and other facilities associated with the manufacturing and/or testing of each SAMSUNG PRODUCT as it relates to parallel-to-serial multiplexing (including prefetch).

26.   The design, operation, and structure of each SAMSUNG PRODUCT generally, and as it relates to parallel-to-serial multiplexing (including prefetch).

27.   The identity and content of any DOCUMENTS related to the design, operation, and structure of each SAMSUNG PRODUCT as it relates to parallel-to-serial multiplexing (including prefetch).

28.   The identity, role, and current whereabouts of persons most familiar with the design, operation, and structure of each SAMSUNG PRODUCT as it relates to parallel-to-serial multiplexing (including prefetch).

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on June 2, 2008, I electronically filed the foregoing with the Clerk of the Court using CM/ECF, which will send notification of such filing(s) to the following:

> Josy W. Ingersoll
> John W. Shaw
> Andrew A. Lundgren

I also certify that copies were caused to be served on June 2, 2008 upon the following in the manner indicated:

BY HAND AND EMAIL

Josy W. Ingersoll
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Andrew A. Lundgren
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/s/ Richard J. Bauer

_____
Richard J. Bauer (#4828)